



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 19, 2023

VIA ECF

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gregoire Tournant*, 22 Cr. 276 (LTS)

Dear Chief Judge Swain:

The Government respectfully writes to request a three-week extension of the current briefing deadlines, which would put the Government's response to the defendant's pretrial motions due February 17, 2023, and the defense reply due March 10, 2023. The defendant does not object. The requested extension is necessary because of the delay in the Government's receipt of one of the defendant's motions. This motion was timely filed under seal but was not shared with the undersigned case team until recently, after the defense and a Government filter team discussed the scope of redactions.

As noted, the defense does not object to the Government's request for an extension. However, defense counsel has asked the Government to inform the Court that the defense does object to the case team directly litigating the issues in the privilege motion. The defense noted that it reserves the right to address this issue with the Court, as necessary, and believes that any hearing on the motion will need to be done with full discovery, as noted in its brief.

In the event that the defense presses that objection, the Government would respectfully request to be heard in response at the appropriate time, but for the avoidance of doubt, the

Government notes that the case team intends to litigate the primary issues raised in the defense motions.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: s/
Nicholas Folly
Margaret Graham
Allison Nichols
Assistant United States Attorneys

cc: Counsel of Record